

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
TRACEY A. KENNEDY, Cal Bar No. 150782
3 ROBERT E. MUSSIG, Cal. Bar No. 240369
H. SARAH FAN, Cal. Bar No. 328282
4 350 South Grand Avenue, 40th Floor
Los Angeles, CA 90071-3460
5 Telephone: 213.620.1780
Facsimile: 213.620.1398
6 E-mail: tkennedy@sheppardmullin.com
rmussig@sheppardmullin.com
7 sfan@sheppardmullin.com

8 Attorneys for Defendant.
CHEVRON U.S.A. INC.,
9 a Pennsylvania corporation

11 UNITED STATES DISTRICT COURT

12 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

13 MARK SNOOKAL, an individual,

14 Plaintiff,

15 vs.

16 CHEVRON USA, INC., a California Corporation,
and DOES 1 through 10, inclusive,

17 Defendants.

Case No. 2:23-cv-6302-HDV-AJR

**JOINT APPENDIX OF DECLARATIONS
AND WRITTEN EVIDENCE RE
DEFENDANT CHEVRON U.S.A. INC.'S
MOTION FOR SUMMARY JUDGMENT
OR, IN THE ALTERNATIVE, PARTIAL
SUMMARY JUDGMENT**

*[Filed concurrently with Notice of Motion; Joint
Brief re Defendant's Motion for Summary
Judgment; Defendant's Statement of
Uncontroverted Facts and Genuine Disputes;
and [Proposed] Judgment granting Defendant's
Motion for Summary Judgment]*

Hearing: May 8, 2025
Time: 10:00 a.m.
Place: Courtroom 5B – 5th Floor
Judge: Hon. Hernán D. Vera

Action Filed: August 3, 2023
Trial Date: August 19, 2025

JOINT APPENDIX OF DECLARATIONS AND WRITTEN EVIDENCE

| Exhibit No. | Party | Description |
|-------------|-----------|--|
| | Defendant | Declaration of Dr. Scott Levy |
| A | Defendant | MSEA Location Clusters Table |
| B | Defendant | August 23, 2019 Email from Dr. Khan re Plaintiff's heart condition |
| | Defendant | Declaration of Dr. Eshiofe Asekomeh |
| C | Defendant | Expatriate Exam Recommendations |
| | Defendant | Declaration of Andrew Powers |
| D | Defendant | Chevron U.S.A.'s Equal Employment Opportunity Policy (HR Policy 400) |
| | Defendant | Declaration of Robert E. Mussig |
| E | Defendant | Excerpts from the Transcript of Plaintiff's Deposition, taken on May 10, 2024 |
| E-1 | Defendant | Plaintiff's Expatriate Assignment Offer |
| E-3 | Defendant | Medical Suitability for Expatriate Assignment History & Physical Examination |
| E-4 | Defendant | July 29, 2019 doctor's note |
| E-5 | Defendant | Expatriate Exam Recommendations |
| E-6 | Defendant | August 29, 2019 email from S. Levy re Patient MS |
| E-7 | Defendant | September 16, 2019 email from S. Levy re medical |
| E-8 | Defendant | September 6, 2019 email from A. Powers re Rescinded Job Offer in Nigeria |
| E-10 | Defendant | September 5, 2019 email from A. Ruppert re Positions in 2H PDC |
| E-12 | Defendant | Job Description for El Segundo Operating Assistant |
| E-17 | Defendant | Plaintiff's resignation letter |
| E-18 | Defendant | Plaintiff's termination paperwork |
| E-19 | Defendant | Plaintiff's Exit Interview |
| F | Defendant | Excerpts from the Transcript of Dr. Eshiofe Asekomeh's Deposition, taken on October 10, 2024 |

| Exhibit No. | Party | Description |
|-------------|-----------|---|
| G | Defendant | Excerpts from the Transcript of Dr. Scott Levy's Deposition, taken on August 30, 2024 |
| H | Defendant | Excerpts from the Transcript of Andrew Powers's Deposition, taken on September 17, 2024 |
| I | Defendant | Excerpts from the Transcript of Dr. Shahid Hameed Khan's Deposition, taken on February 10, 2025 |
| J | Defendant | Excerpts from the Transcript of Dr. Ujomoti Akintunde's Deposition, taken on October 31, 2024 |
| | Plaintiff | Declaration of Plaintiff Mark Snookal |
| 1 | Plaintiff | July 1, 2019 "Assignment Offer" letter |
| 2 | Plaintiff | July 24, 2019 MSEA exam of Mr. Snookal completed by Dr. Sobel |
| 3 | Plaintiff | July 29, 2019 letter from Dr. S. Khan Re: Mr. Snookal |
| 4 | Plaintiff | August 15, 2019 "Expatriate Exam Recommendations" |
| 5 | Plaintiff | August 23, 2019 and August 26, 2019 email thread between Dr. Khan and Dr. Levy Re: Mr. Snookal |
| 6 | Plaintiff | September 4, 2019 through September 6, 2019 email thread regarding Mark Snookal's disability discrimination complaint |
| 7 | Plaintiff | Chevron's "Physical Requirements and Working Conditions GO-308" for the REM Position |
| 8 | Plaintiff | September 16, 2019 email from Dr. Levy to Mr. Snookal |
| 9 | Plaintiff | August 4, 2021 letter of resignation from Mark Snookal |
| 10 | Plaintiff | "Voluntary Termination" Paperwork |
| | Plaintiff | Declaration of Dr. Alexander Marmureanu |
| 11 | Plaintiff | Expert Report of Dr. Alexander Marmureanu |
| | Plaintiff | Declaration of Olivia Flechsig |
| 12 | Plaintiff | Excerpts from the Transcript of Scott Levy, M.D.'s Deposition, taken on August 30, 2024 |
| 12-C | Plaintiff | August 23, 2019 E-mail from Dr. Khan to Dr. Levy |

| Exhibit No. | Party | Description |
|-------------|-----------|---|
| 12-D | Plaintiff | September 16, 2019 E-mail from Dr. Levy to Mr. Snookal |
| 12-E | Plaintiff | Expatriate Assignment History & Physical Examination Form for REM Position |
| 13 | Plaintiff | Excerpts from the Transcript of Dr. Ujomoti Akintunde's Deposition taken on October 31, 2024 |
| 14 | Plaintiff | Excerpts from the Transcript of Dr. Victor Adeyeye's Deposition taken on November 15, 2024 |
| 15 | Plaintiff | Excerpts from the Transcript of Shahid Hameed Khan, M.D.'s Deposition taken on February 10, 2025 |
| | Plaintiff | Declaration of Dolores Y. Leal |
| 16 | Plaintiff | Excerpts from the Transcript of Plaintiff Mark Snookal's Deposition, taken on May 10, 2024 |
| 17 | Plaintiff | Excerpts from the Transcript of Andrew Powers Deposition, taken on September 17, 2024 |
| 17-3 | Plaintiff | September 4, 2019 Email from Mark Snookal to Human Resources Manager Andrew Powers (CUSA000538- CUSA000540) |
| 17-5 | Plaintiff | Andrew Powers Email to Mark Snookal Re: Medical Team Findings (CUSA000542- CUSA000543) |
| 17-12 | Plaintiff | Email from Andrew Powers to medical team in Nigeria (CUSA000650-CUSA000651) |
| 18 | Plaintiff | Excerpts from the Transcript of Dr. Eshiofe Asekomeh's Deposition, taken on October 10, 2024 |
| 18-2 | Plaintiff | Job Description for NMA EGTL Reliability Engineering Manager (SNOOKAL-01157-SNOOKAL-01158) |
| 18-7 | Plaintiff | Dr. Asekomeh email thread with Nigerian cardiologists regarding Mark Snookal's medical report (CUSA000768-CUSA000774) |
| 19 | Plaintiff | Excerpts from the Transcript of Thalia Tse's Deposition, taken on September 13, 2024 |

| Exhibit No. | Party | Description |
|-------------|-----------|---|
| 20 | Plaintiff | Andrew Powers' September 6, 2019 Email to Mark Snookal Re: Disability Complaint Findings (CUSA000644) |
| 21 | Plaintiff | September 4, 2019 Email from Andrew Powers Re: the Rescinded Job Offer in Nigeria (CUSA0000538-540) |
| 22 | Plaintiff | September 6, 2019 Email from Andrew Powers to Mark Snookal Re: the Rescinded Job Offer in Nigeria (CUSA0000542-543) |
| 23 | Plaintiff | September 4, 2019 Emails Re: the Rescinded Job Offer in Nigeria (CUSA0000650-651) |
| 24 | Plaintiff | Defendant, CUSA's Responses to Plaintiff Mark Snookal's Interrogatories Nos. 20-24 |
| 25 | Plaintiff | Defendant CUSA's Response to Plaintiff Mark Snookal's Interrogatory No. 26 |
| 26 | Plaintiff | Defendant CUSA's Response to Plaintiff Mark Snookal's Interrogatory No. 33 |
| 27 | Plaintiff | August 15, 2019 Email from Dr. Pitan to Dr. Asekomeh (CUSA-0000824-0000827) |
| 28 | Plaintiff | Escravos Medevac Records for 2017-2022 (CUSA0000830-0000836) |
| 29 | Plaintiff | September 4, 2019 Emails Re: Mark Snookal's Rescinded Job offer in Nigeria (CUSA0000983-985) |
| 30 | Plaintiff | July 9, 2019 email from Chevron to Mark Snookal Re: New Assignment (CUSA0000986-0000988) |
| 31 | Plaintiff | August 26, 2019 Emails Between Dr. Arenyeka and Dr. Levy Re: Mark Snookal (CUSA0000995-0000997) |
| 32 | Plaintiff | August 20, 2019 Email from Dr. Frangos to Dr. Levy and Dr. Arenyeka Re: Nigeria Medical Determination (CUSA0001003-0001006) |
| 33 | Plaintiff | August 23, 2019 Email from Dr. Levy to Eldyleida Seca Torres Re: Msea (CUSA0001041) |

| Exhibit No. | Party | Description |
|-------------|-----------|---|
| 34 | Plaintiff | August 23, 2019 Email from Dr. Khan to Dr. Levy Re: Mark Snookal (CUSA0001042-0001043) |
| 35 | Plaintiff | September 5, 2019 Emails Re: Nigeria Medical Determination (CUSA0001236) |
| 36 | Plaintiff | June 6, 2019 Email recommending Mark Snookal for the Reliability Engineering Manager position (CUSA0001435-1438) |
| 37 | Plaintiff | Summary of Cardiology Opinions – NMA Cardiologists and Emails Re: Mark Snookal’s Medical Report (CUSA0001520-CUSA0001525) |
| 38 | Plaintiff | August 7, 2019 Email from Dr. Asekomeh to Dr. Pitan Re: Mark Snookal’s Medical Summary (CUSA0001526-0001527) |
| 39 | Plaintiff | The screenshot collected on or about November 11, 2024 of Dr. Stephen Frangos’ public LinkedIn page. |

Dated: March 27, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ Tracey A. Kennedy
TRACEY A. KENNEDY
ROBERT E. MUSSIG
H. SARAH FAN

Attorneys for Defendant
CHEVRON U.S.A. INC.,
a Pennsylvania Corporation